

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

BENJAMIN M. GAMORAN, derivatively on behalf of
the nominal defendant with respect to its series
mutual fund, the Neuberger Berman International
Fund,

Plaintiff,

-against-

NEUBERGER BERMAN MANAGEMENT LLC, *et al.*,

Defendants,

-and-

NEUBERGER BERMAN EQUITY FUNDS d/b/a
NEUBERGER BERMAN INTERNATIONAL FUND,

Nominal Defendant.

11 Civ. 7957 (TPG) (KNF)

ECF Case

**NOTICE OF MOTION TO
DISMISS THE
COMPLAINT**

Oral Argument Requested

PLEASE TAKE NOTICE that, upon the Amended Verified Derivative Complaint, dated July 13, 2012 (a copy of which is annexed hereto as Exhibit A); the accompanying Declaration of Douglas W. Henkin, dated August 24, 2012, and the exhibits thereto; the Memorandum of Law in Support of the Investment Adviser Defendants' Motion to Dismiss the Amended Complaint, and upon all prior proceedings had herein, Defendants Neuberger Berman Management LLC, Neuberger Berman LLC, Benjamin Segal, Peter E. Sundman, and Jack L. Rivkin, by their undersigned attorneys, will move this Court, at a time and place to be determined by the Court, for an order dismissing the Amended Verified Derivative Complaint pursuant to Federal Rules of Civil Procedure 12(b)(6), with prejudice, and for such further and other relief as the Court may deem just and proper.

Dated: New York, New York
August 24, 2012

Respectfully submitted,

MILBANK, TWEED, HADLEY & McCLOY LLP

By: /s/ Douglas W. Henkin

James N. Benedict
jbenedict@milbank.com
Douglas W. Henkin
dhenkin@milbank.com
Alan Stone
astone@milbank.com
Mia C. Korot
mkorot@milbank.com
One Chase Manhattan Plaza
New York, New York 10005
(212) 530-5000

*Attorneys for Defendants Neuberger Berman Manage-
ment LLC, Neuberger Berman, LLC, Benjamin Segal,
Peter E. Sundman, and Jack L. Rivkin.*